

HRP01179 EPBC Act Facilitated  
David Perkins

11 August 2016

Queensland Major Projects Section  
Environment Assessment Branch  
Department of the Environment  
GPO Box 787  
CANBERRA ACT 2601

Email: [leigh.barker2@environment.gov.au](mailto:leigh.barker2@environment.gov.au)

Dear Leigh

Cardno (Qld) Pty Ltd  
ABN 57 051 074 992

Level 11  
515 St Paul's Terrace  
Fortitude Valley QLD 4006  
Australia

Phone: +61 7 3369 9822  
Fax: +61 7 3369 9722  
[www.cardno.com](http://www.cardno.com)

## **TURTLE STREET BEACH RESORT, CURTIS ISLAND (EPBC 2015/7585) – POTENTIAL FOR FACILITATED IMPACTS**

I refer to our recent telephone conversation regarding the potential for facilitated impacts arising from the proposed Turtle Street Beach Resort on Matters of National Environmental Significance. This issue has apparently arisen due to the Department's review of the Proponent's website and in particular the drop down menu indicating resort activities.

The following comments highlight that the potential for facilitated impacts are low and in any case can be appropriately managed through standard permitting requirements (Queensland Department of National Parks, Sport and Racing "DNPSR" and the Great Barrier Reef Marine Park Authority "GBRMPA").

### **1.0 Proponent's Website**

We are advised by the proponent, Mr Reigel, that the Turtle Street Beach Resort website was formulated in 2009 and represents a list of activities relevant only as a "wish list" at that time. Many changes have occurred on the Island since 2009. For example, in 2010 the Commonwealth Minister for the Environment approved the Queensland Curtis LNG Project. In 2015 the last cattle were mustered off Monte Christo Island with the proponent surrendering grazing rights. As such not only has the proponent historically surrendered a significant area of land (32,890 hectares) for National Park, Conservation Park and a Vegetation Offset Area, it has also ceased cattle operations that had operated for well over 100 years on the Island.

Also, since 2009 QRE's thinking has evolved on the concept of self-directed activities by guests. Insurance considerations and potential liability issues are such that QRE's position is to not allow private vehicles on activities taking place on its lease.

Mr Reigel advises that the website is seriously out of date with the list of activities and floor plans not updated for a period of some 7 years.

## **2.0 Access and Intensity of Use**

The number of guests on the island at the resort at any one time will likely be in the order of 310 persons. This is based on an average occupancy of 70% (which is consistent with recorded occupancy rates elsewhere in Queensland coastal island locations). Key assumptions include:

- 177 units/villas X 2.5 people per unit = 442 total guest population @ 100% occupancy; and
- 70% average occupancy = 310 total guests population on average.

Any activities associated with the resort have the opportunity to be managed to a greater degree than is provided for visitors who make their own way to Curtis Island via the Southend barge.

35-40% of resort guests will arrive by plane or helicopter. The balance will arrive by water taxi with resort vehicles then shuttling guests between the barge landing facility at Hobble Gully and the resort. Resort guests will be discouraged from bringing their own 4WD to the resort. No vehicle access is permitted to the foreshore within the resort site.

Any vehicles brought by a guest will not be allowed within the resort precinct and will be parked in the infrastructure area. QRE will, subject to necessary permits, be offering guided tours for guests to other parts of the island including any turtle watching activities. QRE would expect less than 5% of visitors to bring their own vehicles and whilst QRE can't prevent guests from using public roads, the nature of the activities would effectively reduce guest's use of their own vehicles to near nil. Resort vehicles (around 2-3) will primarily be involved in shuttling guests within the site and in day to day resort operations including servicing and maintenance. Around 3-4 vehicles will be available for site seeing/trips outside the resort precinct.

Furthermore the scale of the island is easy to underestimate for those who have not visited the island. It is physically difficult to walk a significant distance from the resort precinct. Also, the roads are 4WD tracks only, rough and easily affected by wet weather. Simply, the island is not easy to travel around and travel times are significant and it would be very easy for guests to get lost.

## **3.0 Activities**

Guests at a resort need to be offered a range of activities in order to ensure that the average stay (aimed at 4 days) is achieved. Some guests will most likely not leave the confines of the resort precinct and the attractions provided within the precinct are designed to cater for this component of guests:

- Bars
- Pools
- Conference facilities
- Day spa
- Tennis courts

As outlined in our letter of 31 May 2016 the proponent has removed aspects of marine tourism activities from the EPBC Act referral on the basis that these aspects of the application will be addressed at the time when the proposed extent of water activities have been resolved.

A proportion of guests (perhaps 30%) will venture out of the resort precinct by vehicle during their stay. The options are to travel north, south or to take to the water. Any waterborne activities within the GBRMPA will be subject to separate permits.

The majority of Curtis Island is now National Park, Conservation Park or Regional Park. These areas are managed by the Department of National Parks, Sport and Racing. Commercial activity permits are required for any commercial activities. Examples of activities requiring a Commercial Activity Permit include:

- Guided tours
- Events
- Scenic flights
- Vending (e.g. mobile food vending)
- Scuba diving
- Motorised activities.

Please refer to the following link which explains the process for applying for commercial activity permits (<https://www.business.qld.gov.au/industry/tourism/parks-recreation-forests/commercial-activity-permit>).

In essence the activities listed on the proponent's web-site are aspirational and are subject to achieving specific further permits whether they be for activities in protected terrestrial areas or in protected marine areas. It is not appropriate to seek to obtain these permits until the matter of the EPBC referral is finally resolved.

## CONCLUSION

As advised in our 31 May 2016 letter any reference to marine tourism activities has been removed from the referral on the basis that a separate GBRMPA permit will be made at the time when the proposed extent of water activities have been resolved.

As demonstrated above the potential for facilitated impacts arising from the proposed project are low and having regard to the size of Curtis Island and the surrounding National Park management regimes and tenure. Furthermore, were they to occur they can be managed through standard State Government and GBRMPA permitting requirements.

Should you require any further details or clarification on any of these matters please contact David Perkins on 07 3310 2354 or [david.perkins@cardno.com.au](mailto:david.perkins@cardno.com.au).

Yours faithfully



David Perkins

Senior Principal  
Cardno